

6/12/86

Ramirez  
Deposition

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

ADELINE DUGAS RAMIREZ,  
ET AL

NO. 85-3620

VERSUS

GROUP 6

FIBREBOARD CORPORATION,  
ET AL

(MANGUNO  
CONSOLIDATED CASES)

(NO. 82-1570 "A")

Testimony of ADELINE DUGAS RAMIREZ,  
taken by defendants, pursuant to notice, at the  
Law Offices of Deutch, Kerrigan & Stiles,  
Attorneys at Law, 755 Magazine Street, New  
Orleans, Louisiana 70130 on June 12th, 1986.

REPORTED BY:

PAUL W. WILLIAMS

Paul W. Williams, Inc.

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1 APPEARANCES:

2 FOR THE PLAINTIFFS:

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15 FIBERGLAS, EAGLE-PICHER, PITTSBURGH-CORNING,  
16 CELOTEX CORPORATION, KEENE CORPORATION AND  
17 ROCKWOOL MANUFACTURING COMPANY:

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19 Attorneys at Law  
20 755 Magazine Street  
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22 (BY: ETHEL H. COHEN, ESQ.)

23 FOR STANDARD INSULATIONS:

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## S T I P U L A T I O N

It is stipulated and agreed by and among the various parties that the testimony of the witness may be taken by defendants, pursuant to notice, at the time and place hereinbefore noted; that the testimony of the witness may be taken down in shorthand (Stenotype) by PAUL W. WILLIAMS, and by him transcribed, the formalities of signing, sealing, certification and filing being waived, and all objections, save objections to the form of the question, being reserved to the time of trial.

It is further stipulated that the witness may be sworn by Paul W. Williams, Certified Shorthand Reporter and Registered Professional Reporter in and for the State of Louisiana.

\* \* \* \* \*

1 ADELINE DUGAS RAMIREZ,  
2 having been first duly sworn, was examined and  
3 testified as follows:

4 EXAMINATION BY MS. COHEN:

5 Q I am Harriet Cohen and I represent some of  
6 the defendants in this lawsuit that has  
7 been filed on your behalf. I will ask  
8 you some questions. If any of my ques-  
9 tions, for any reason, aren't clear to  
10 you, just let me know so that I can ask  
11 them to you again.

12 A Okay.

13 Q What is your full name, please, and address?

14 A Adeline Dugas Ramirez. I live at  
15 [DELETED]

16 Q Is that a home that you own or are you pur-  
17 chasing it?

18 A That is a home that I own.

19 Q Does anyone live at that address with you?

20 A No, ma'am.

21 Q What is the date of your birth?

22 A [DELETED]

23 Q Have you ever been employed?

24 A No.

25 Q Have you a Social Security number?

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1 A Yes.

2 Q Do you know that number?

3 A I have it in my wallet.

4 Q Would you get that, please, and read it out  
5 to us?

6 A Sure. (Referring to documents) no, I don't  
7 have it in my wallet. The reason I  
8 carry this, I was afraid somebody would  
9 grab my purse and get my driver's  
10 license and everything. It is  
11 [DELETED]

12 Q Do you by any chance know Mr. Ramirez's  
13 Social Security number?

14 A I have that with me, or I think I have it  
15 with me in one of the envelopes --  
16 doggone it -- I know I have it --  
17 [DELETED]

18 Q [DELETED]

19 A Yes, [DELETED]

20 Q Was Mr. Ramirez your only husband?

21 A Yes, ma'am.

22 Q When did you all marry?

23 A January 9th, 1938.

24 Q You had daughters, I believe, born of that  
25 marriage?

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1 A Two daughters, uh-huh.

2 Q Their names and dates of birth?

3 A The oldest one is Myrna Ramirez, and she was  
4 born [DELETED]

5 Q Sorry?

6 A [DELETED]

7 Q Does she live here in town?

8 A In [DELETED]

9 Q Your other daughter?

10 A My other daughter is Glenda Ramirez Lefont.

11 Q Her date of birth?

12 A [DELETED]

13 Q She lives here?

14 A In [DELETED]

15 Q I would assume that neither of your daughters  
16 was dependent upon your husband for  
17 support at the time of his death?

18 A That is correct.

19 Q I was going to ask you the date of Mr.  
20 Ramirez's birth, but I have it written  
21 here as [DELETED]

22  
23 A Right.

24 Q One thing I would like to talk with you some  
25 about is your husband's work history.

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1                   When you-all married in 1938, was he  
2                   employed then?

3    A           He was employed for McWilliams Dredging  
4                   Company. He worked as a baker in the  
5                   kitchen.

6    Q           McWilliams?

7    A           Yes, Dredging Company, uh-huh.

8    Q           Was that on vessels?

9    A           Yes. After we married he worked there until  
10                  1939. I think it was about May of 1939.

11   Q           Do you know about how long he had been there  
12                  when you were married?

13   A           He had been there about a year and a half to  
14                  two years. I can't remember exactly.

15   Q           Altogether?

16   A           Uh-huh.

17   Q           Then where did he go to work?

18   A           Then he went to R. J. Dorn Asbestos Roofing  
19                  Company.

20   Q           D-o-r-n?

21   A           D-o-r-n, uh-huh.

22               MS. COHEN:

23                               Do you by any chance have a Social  
24                               Security printout?

25               MR. COVERT:

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1 I don't, I don't believe. I don't  
2 believe I received it yet, but when I  
3 do, I will certainly send it to you.

4 MS. COHEN:

5 Okay.

6 EXAMINATION BY MS. COHEN:

7 Q That was R. J. Dorn Insulation?

8 A Roofing and siding and things like that.

9 Q Do you know the kind of work he did for them?

10 A He worked all over the plant. They way I  
11 understood him to say, he was all over  
12 the plant. When he worked there, he was  
13 all over.

14 Q Is it your understanding they manufactured  
15 roofing and siding products?

16 A Well, they made roofing and siding things,  
17 mostly roofing, I think.

18 Q And they were made right at the plant and he  
19 worked right in the plant?

20 A Right.

21 Q Do you know what it was that he did?

22 A Well, the only thing I can remember him  
23 saying, he caught the shingles in the  
24 back of the machine that put them out,  
25 but I don't know -- I know he said he



1 worked all over the plant, but I can't  
2 really remember what the other things  
3 were.

4 Q Can you remember about how long he stayed  
5 there?

6 A He stayed there from 1939 until -- can I look  
7 at my notes? I have it written here.

8 Q You brought those little notes with you here  
9 today?

10 A Yes. He worked at Dorn from 1939 until 1942,  
11 and next he went to Delta Shipyard from  
12 '42, March of '42, until 1944.

13 Q Do you know what he did at Delta?

14 A He was a welder there, and from there,  
15 November 23rd, 1945, he went to Avondale  
16 Shipyard. He worked there until  
17 February 15th, when he retired -- that  
18 was in 1979, when he retired then.

19 Q He was at Avondale all that time?

20 A All that time, 34 years. He had to take an  
21 early retirement at age 62.

22 Q Do you know if he had the same job the whole  
23 time he was there?

24 A He was a welder.

25 Q Did he ever talk with you about his job?

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1 A Yes. He said it was very hard. He used to  
2 tell me about it and he worked hard for  
3 sure. He would go down in barges, into  
4 ship bottoms, what he called them, and  
5 would weld in there. It was just a fan  
6 blowing on him, and he would come home  
7 sometimes with red lead poison, when he  
8 couldn't eat -- he drank only milk, took  
9 a bath and went to bed. He was sick  
10 those days. He had this red lead  
11 poisoning.

12 Q I was going to ask you when you said he was  
13 a welder, if he had ever, to your  
14 knowledge, had an adverse response to  
15 welding? I know some of the men who do  
16 it have told me that they would get sick  
17 sometimes to the extent of going to the  
18 hospital. When you say red lead  
19 poisoning, I'm not sure if that is what  
20 these men get from welding. Do you know  
21 what red lead is?

22 A Well, I know when he welded, what he called  
23 red lead, and he red lead -- he would  
24 red lead pipes is what he said, and it  
25 made him deathly sick.

1 Q What were his symptoms?

2 A Well, when he had it?

3 Q When he had the red lead poisoning?

4 A He would vomit, he couldn't eat.

5 Q Was it ever necessary for him to see a  
6 physician?

7 A No, not then. He would just drink a lot of  
8 milk when this would happen.

9 Q What would that do?

10 A Help him, you know, it soothes the stomach,  
11 I imagine.

12 Q Was this red lead poisoning something that  
13 you would say he experienced frequently  
14 over the years that he worked there?

15 A Not too frequently, no. In the later years,  
16 however, it seems like he didn't fool  
17 with the red lead pipes at all.

18 Q Could you estimate about when it was, please,  
19 that he didn't work with the red lead  
20 pipes anymore?

21 A I can't remember that, really.

22 Q Did he ever have any other response, as far  
23 as you know, to welding, any other  
24 aggravation from fumes or --

25 A Well, he did have fumes a lot of times,

1 especially when he would weld in the  
2 bottom of ships, you know, and that  
3 would make him sick. I guess he would  
4 swallow so much smoke and everything  
5 that it would make him sick. I know  
6 the nights he had that, he would not eat  
7 any supper. All he could do is take a  
8 bath and go to bed.

9 Q Is that the same, though, when you talk  
10 about swallowing the fumes, is that the  
11 same as red lead poisoning?

12 A No, this is different.

13 Q I was going to ask you about that. He would  
14 come home feeling bad, he couldn't eat--

15 A Came home feeling bad, couldn't eat or any-  
16 thing.

17 Q Was it a different feeling that he had than  
18 when he had red lead poisoning?

19 A Yes, uh-huh.

20 Q What were the symptoms from the fumes?

21 A I can't tell you exactly what it was. It  
22 was similar to the red lead poisoning,  
23 but it --

24 (DISCUSSION OFF THE RECORD)

25 EXAMINATION BY MS. COHEN:

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1 Q I was asking you if you could differentiate  
2 between your husband's response to red  
3 lead poisoning and to the welding fumes.

4 A Well, it just made him sick too, you know,  
5 sick to the stomach, you know.

6 Q Did he ever tell you about any times that he  
7 might have had difficulty breathing  
8 because of fumes?

9 A He never really told me anything. It would  
10 make him cough, I know that.

11 Q Was that a cough that he had all the time or  
12 when the fumes were affecting him?

13 A Just when he had the fumes, he would cough a  
14 lot.

15 Q I think you told us you didn't know of any  
16 instances where he went to the doctor  
17 for the red lead poisoning. What about  
18 for the fumes from the welding? Do you  
19 know any times that he might have had to  
20 go to a doctor for that? - - -

21 A No, but he would go to first-aid. He had  
22 first-aid there, and he would go there.  
23 When he was too sick, he would go there.  
24 I don't know what they gave him there.

25 Q Was that for both the welding fumes and the

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1 red lead poisoning or just the welding  
2 fumes?

3 A I think that was for the red lead poisoning.

4 Q Was he friendly with any of his co-workers  
5 there --

6 A Yes.

7 Q -- to the extent they maybe would go to a  
8 ball game or somebody's house or some-  
9 thing like that?

10 A Yes.

11 Q Can you think of any of the men that he  
12 worked with?

13 A There was a Fradell Piccola, his best friend.  
14 He is still there.

15 Q What was the name?

16 A Piccola.

17 Q Do you know what his job was?

18 A He was a welder too.

19 Q Any other men you can think of?

20 A Mr. Alton Gros.

21 Q He was a welder also?

22 A He was a welder also.

23 Q Were there any times that your husband may  
24 have told you about any other work con-  
25 ditions that might have caused him some

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1 distress, maybe any dust or chemicals or  
2 anything else like that?

3 A He worked around a lot of sandblasting, I  
4 know that.

5 Q Do you remember if he ever said anything  
6 about any of the blasting taking place  
7 inside one of the vessels?

8 A No, I don't know, really.

9 Q Did he ever tell you that the sandblasting  
10 gave him any kind of physical difficul-  
11 ty?

12 A He didn't tell me anything.

13 Q But you know he worked around it a lot?

14 A Yes.

15 Q Any other substances, any chemicals or dust  
16 or fumes or anything like that besides  
17 those we talked about?

18 A I really can't say; I don't know.

19 Q Did he ever have any second jobs, like at  
20 night or on weekends?

21 A No, uh-uh. He worked there most of the time,  
22 seven days a week at Avondale. He was  
23 one of the older men and when they had  
24 a little job, they would call him.

25 Q You told us his first job was as a baker.

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1 Was baking something that he continued  
2 on as a hobby?

3 A No. He would bake the cakes and the pies  
4 for the men.

5 Q But over the years, when you were married,  
6 did he make cakes or breads or anything  
7 like that?

8 A No. When we got married, he quit his cook-  
9 ing. I had to take over.

10 Q Mr. Covert gave me an article, a newspaper  
11 article, just a few minutes ago from  
12 the Times-Picayune of May 2nd, which I  
13 haven't had yet the opportunity to read,  
14 "International Building Products Site  
15 at 5300 Tchoupitoulas Street."

16 A Uh-huh.

17 Q You gave this article to Mr. Covert?

18 A Yes. My daughter gave it to him.

19 Q One of your daughters gave it to him?

20 A Yes.

21 Q Which one is that?

22 A Glenda Lefont.

23 Q Do you know why she gave it to him?

24 A She thought it was something interesting  
25 about asbestos; that's all I know.

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1 Q Did you all ever live --

2 A Right across the street, 5317 Tchoupitoulas  
3 Street, when we moved to New Orleans.  
4 That is where we moved.

5 MR. GROSSEL-ROSSI:

6 5317?

7 THE WITNESS:

8 Yes. That was my address, right  
9 across the street from the plant.

10 EXAMINATION BY MS. COHEN:

11 Q What year are we talking about?

12 A 1939. We stayed there 13 years.

13 Q Where did you move from Tchoupitoulas  
14 Street?

15 A We lived in White Castle, Louisiana.

16 Q Your husband commuted on down to work?

17 A Well, what do you mean?

18 Q After you moved from Tchoupitoulas Street?

19 A Oh, from Tchoupitoulas Street. We moved to  
20 Gretna, Louisiana -- we moved to Harvey,  
21 Louisiana. It is right close, you  
22 know. He used to commute to work, and  
23 that is why we moved across the river,  
24 so he could be closer to Avondale  
25 Shipyards then.

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1 Q And you remained on the Westbank --

2 A Pardon me?

3 Q You remained on the Westbank for the rest of  
4 your married life?

5 A Yes, ma'am.

6 Q Did your husband have any hobbies then?

7 A He was a gardener. He liked the yard, and  
8 that is about all he did, worked in the  
9 yard. That was his only hobby. He  
10 didn't have much time for a hobby before  
11 he retired, though.

12 Q What was the date of his retirement, as close  
13 as you can recall?

14 A I have it here -- (referring to documents)  
15 wait, he retired February 15th, 1979.

16 Q If my math is correct, he was 62 then?

17 A Yes.

18 Q What was the reason he retired?

19 A Well, he started being sick with emphysema.  
20 Well, he started before that, but he  
21 worked as long as he possibly could, and  
22 then he couldn't go -- he was waiting  
23 until he was 62 to retire. He couldn't  
24 go anymore.

25 Q What were his symptoms?

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1 A Shortness of breath.

2 Q Anything else?

3 A Well, he coughed too, but he couldn't take a  
4 deep breath.

5 Q Was that shortness of breath something that  
6 was noticeable to you?

7 A When we started noticing it is the second  
8 time he went to Charity Hospital. He  
9 was very sick. I brought him to my  
10 family doctor, and this was -- oh, what  
11 was his name -- let me see, that was --  
12 that was January 28th, 1974. He was  
13 very sick, and I brought him to my family  
14 doctor. He said since Charity had all  
15 of his records from '53, he said "Bring  
16 him back there." He took X-rays of him  
17 and could not understand the X-rays,  
18 they were so terrible, so he -- he  
19 stayed in Charity three weeks and they  
20 found out then he had an abscess on his  
21 lung, and he had double pneumonia. He  
22 stayed there from January '74 until  
23 February 16th of '74.

24 Q So around the date you were telling us that  
25 he got so sick that you told him to see

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1 the doctor --

2 A He was spitting up blood and everything.

3 Q Before that time, had you noticed that he  
4 was --

5 A I noticed he was getting short of breath,  
6 and he was tired all the time. At  
7 first he would go every three months  
8 for a check-up, and that was in 1953 or  
9 '54, and then they had him go every six  
10 months after that, and they would always  
11 tell him "Your X-rays are the same."  
12 They were always the same. They would  
13 take two or three X-rays of him there,  
14 and then our doctors thought he had  
15 tuberculosis then, but Charity said  
16 "No, he doesn't have any tuberculosis."

17 Q That was 1953-'54?

18 A That was in 1953. The X-ray unit went to  
19 Avondale to take X-rays of the -- he was  
20 not sick then. They took X-rays of the  
21 welders there, you see, and this doctor  
22 called -- my family doctor then called  
23 me one afternoon and told me -- he asked  
24 me where my husband was, and I said he  
25 was at work. He said "You call him at

1 work and tell him to come in. His  
2 X-rays are so terrible." That was in  
3 1954.

4 Q Okay.

5 A He said his X-rays were so bad that "We don't  
6 understand his X-rays." He said "We're  
7 going to have to send him to the hos-  
8 pital somewhere so they can diagnose his  
9 case, what is wrong with him," so this  
10 doctor suggested that he go to Charity.  
11 He said "That is about the" -- in 1954,  
12 he told us that was about the best hos-  
13 pital there that could diagnose his  
14 case.

15 Q Let me -- I'm sorry, go ahead.

16 A So I brought him to Charity. They isolated  
17 him at first. They didn't know what was  
18 wrong with his lungs. I saw his X-rays  
19 myself. Naturally I didn't understand  
20 them. All I could see was they were  
21 full of rings all over. It seemed like  
22 the bronchioles were full of rings, and  
23 he stayed in Charity then about, oh,  
24 nine days, and when he would -- when  
25 we would go see him, I would ask him

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1           what did the doctor tell him, and he  
2           would say "All they tell me is that I  
3           have asbestosis." I never heard of  
4           "asbestosis" before in my life -- I'm  
5           sorry --

6   Q       Let me be sure of this, so that I have a  
7           handle on these things. In 1953 --

8   A       That was 19 -- it was 1953 or 1954.

9   Q       In 1953 or '54, he wasn't showing any  
10          symptoms or complaining?

11   A       No.

12   Q       But there were some X-ray studies done at  
13          Avondale?

14   A       Right.

15   Q       Now, as far as you know, that is something  
16          that Avondale caused to take place?

17   A       Oh, he had been at Avondale then since 1945.

18   Q       But Avondale had the X-rays made; is that the  
19          way it was?

20   A       Right.

21   Q       Do you, by any chance, know who did the  
22          X-rays?

23   A       No, I don't. It was the Public Health Unit,  
24          I believe ~~it~~ was, that would go there  
25          and X-ray the men. In fact, that is the

1           only time they ever went there.

2   Q       That is what I was going to ask you, if you  
3           knew whether they had been there before  
4           '53 or '54.

5   A       No, this was the first time.

6           MS. COHEN:

7                   Off the record.

8                   (DISCUSSION OFF THE RECORD)

9   EXAMINATION BY MS. COHEN:

10   Q       Okay. The doctor called one day, I believe  
11           you said, as far as you can remember,  
12           because of whoever took the X-rays, or--

13   A       Well, you see, when that little X-ray unit  
14           went to Avondale, naturally they had to  
15           get the name of the family doctor. Then  
16           they sent the X-ray -- they sent the  
17           report to Dr. Francis Gidman. Well, he  
18           has since died. That is who called me,  
19           Dr. Gidman, and he told me to tell my  
20           husband to come to the office right  
21           away, that something was terribly wrong  
22           with his X-rays, and that he had to see  
23           him, but he couldn't tell him what was  
24           wrong then. That is when they sent him  
25           to Charity.

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1 Q Then he stayed there for nine days?

2 A Uh-huh, about nine days, uh-huh, I think.

3 Q Then what happened when he came out?

4 A When he came out, he went back to work and he  
5 was all right, as far as I know.

6 Q And then was it 1974 when he next had prob-  
7 lems, or was there any time between  
8 1953-54 on up to 1974 when he was having  
9 any medical treatment?

10 A No, he didn't have any more trouble between  
11 that time.

12 Q During the 20 years --

13 A He seemed to be all right.

14 Q How about any other health conditions during  
15 those 20 years?

16 A Everything else was all right.

17 Q Then on January 28th of 1974 he was real sick  
18 and you took him to the doctor?

19 A Uh-huh.

20 Q What doctor was that?

21 A That was Dr. William Moseby.

22 Q Was he the family doctor at that time?

23 A Yes, he was. My husband really wasn't sick  
24 enough to go to the doctor at any time.

25 The only place he would go was to

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1 Charity for check-ups, because there  
2 was nothing else wrong with him except  
3 his lungs, that we knew of, you know,  
4 and this was my family doctor.

5 Q But then from 1953 or 1954 up until 1974,  
6 even though he appeared to be in good  
7 health, he would go out to Charity every  
8 now and then for a check-up?

9 A Yes. He had to go at first, every three  
10 months, after 1954 when they discovered  
11 this stuff on his lungs, you know, and  
12 bronchioles, you know, and he would go  
13 every three months for a check-up for a  
14 few years. Then they would put him off  
15 to every six months, but he went every  
16 six months for an X-ray at Charity.

17 Q Did you ever have the chance to talk to any  
18 of the doctors out there?

19 A No, ma'am, I didn't.

20 Q Did your husband ever come home and say what  
21 any of the doctors said to him?

22 A He always said his X-rays were the same.

23 Q So then on that date in January of 1974, he  
24 got real sick and you took him to the  
25 doctor?

1 A Right.

2 Q Were there any complaints or symptoms leading  
3 up to that, or just all of a sudden one  
4 day --

5 A All of a sudden, you know, he came home with  
6 chills and fever, a high fever. I  
7 thought probably he had virus, so I  
8 wanted to take him to the doctor. In  
9 fact, I did call Dr. Moseby and I told  
10 him that he had chills and fever, and I  
11 explained his symptoms and everything.  
12 He said "Well, he must have a virus,"  
13 so he sent out some medicine for him.  
14 Then in two more days he was worse. I  
15 called Dr. Moseby on Sunday morning, and  
16 by Monday he was worse, but he would not  
17 go to the doctor. He said he was too  
18 sick. I think it was about Tuesday, and  
19 I said "You have got to get up and go to  
20 the doctor. You can't stay like this  
21 anymore." My daughter was living with  
22 us then, the one that was single, and  
23 she told me then -- she said "Mama, you  
24 had better take him to the doctor." He  
25 was spitting blood. You see, he was

1       hiding everything from me, so I took him  
2       to Dr. Moseby, and by then he was cough-  
3       ing and spitting up in there, and I  
4       asked them at the office if they could  
5       take him first, because he was so sick,  
6       so they took him as the first patient.  
7       Dr. Moseby naturally had an X-ray made  
8       of him right away, because they have an  
9       X-ray place right there in the office,  
10      and he said "Oh, my God, I believe you  
11      have tuberculosis." He said "Your X-rays  
12      are so bad," and he said "your lungs are  
13      all infected." He said "We're going to  
14      have to take him to the hospital right  
15      away." My son-in-law took me to the  
16      hospital with him right away. He told  
17      us to take him to Charity, since they  
18      had all of the records there, you know,  
19      so I stayed with him there at Charity  
20      until they admitted him. That was all  
21      from 12:00 o'clock up to 6:00 o'clock  
22      that night. They examined him and took  
23      X-rays of him, told him right then and  
24      there it ~~was~~ not tuberculosis he has,  
25      but he had a big spot on one of his

1 lungs, and they didn't know what it was,  
2 but he said "We'll find out in the next  
3 few days." There was a pulmonary doctor  
4 there, and -- well, I went to see him  
5 every night. There were a lot of doc-  
6 tors around. Every time you go in  
7 there, there were about five or six  
8 doctors around him at night. Finally  
9 I asked the doctor one day, I said  
10 "When will you all release him from  
11 here?" It was about two weeks. He  
12 said "We can't release him yet. He  
13 still has the spot on his lungs and is  
14 still running a temperature, but we  
15 think it is an abscess. We'll find out  
16 more in a few days." So the next night  
17 I went and he said they were going to  
18 take him the next day -- they went  
19 through his nose and drained that spot  
20 on his lungs, and after that they --  
21 they kept him about a week longer. He  
22 was weak when he came home. He couldn't  
23 work for about three months after that.  
24 They diagnosed that as pulmonary  
25 function -- oh, I had the papers there.

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1 I had all of the papers when he went to  
2 Charity. I admitted him with Blue  
3 Cross, when I admitted him, but they  
4 kept sending me the bills, so I sent this  
5 to Avondale. This is what they sent me  
6 back, right here (indicating). This is  
7 when he went in the second time.

8 MS. COHEN:

9 Two of the papers have to do with  
10 his retirement.

11 THE WITNESS:

12 Did I give you the wrong ones?  
13 Wait awhile, please -- did I give you  
14 the wrong ones and left the other ones  
15 at home?

16 MS. COHEN:

17 These are about retirement.

18 THE WITNESS:

19 I thought surely I had those with  
20 me. (Referring to documents) no, this  
21 is not it either. I thought surely that  
22 was it -- yes, it is, right here -- yes,  
23 this is it. I just found those the  
24 other day. I was trying to find out the  
25 day he went to Charity the second time.

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1 MR. COVERT:

2 This is the statement where they  
3 did the bronchoscopy, as well as the  
4 pulmonary function tests.

5 MS. COHEN:

6 This seems to be just some state-  
7 ments --

8 MR. COVERT:

9 I think they are statements  
10 supporting the medical reports.

11 EXAMINATION BY MS. COHEN:

12 Q So then how was he feeling by the time he was  
13 discharged?

14 A He was not feeling well. They discharged him  
15 anyway, and then he stayed off of work  
16 three months after that.

17 Q Then he went back to his job?

18 A He went back to work, but it was hard. He  
19 couldn't hardly work. He was trying to  
20 stick it out until he was 62 years old,  
21 you see.

22 Q Did Avondale have any disability program at  
23 that time?

24 A Yes.

25 Q Did he try to determine his eligibility for

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1 the disability program, when he got out  
2 of the hospital at that time?

3 A He was on disability for three months, but  
4 he didn't try to get a permanent dis-  
5 ability. He just tried to go on and  
6 work. He would not be getting enough  
7 -- you see, they were only giving him  
8 \$150 a week then for the three months  
9 he was disabled.

10 Q Was he having any symptoms that you could  
11 see, when he came out of the hospital,  
12 that -- I understand you say he felt  
13 bad, but how about shortness of breath,  
14 coughing, anything like that?

15 A He would cough, but he was not too short --  
16 he was short of breath then, but not  
17 like -- not like he was a few years  
18 later when he retired.

19 Q Was that the first time that you started  
20 noticing shortness of breath, after  
21 that?

22 A After this pneumonia he had and the abscess  
23 on his lungs.

24 Q When he went back to work, would you say that  
25 there was a period of improvement when

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1 he was symptom-free, or did he kind of  
2 just gradually go down, or --

3 A Well, he was gradually going down then, and  
4 he couldn't -- he had to climb a lot,  
5 and he could not climb anymore. They  
6 had to give him an easier job, you know.

7 Q And that decline lasted all the way until  
8 his retirement?

9 A That's right.

10 Q He could not climb as soon as he went back?

11 A He couldn't, no.

12 Q But he still remained a welder, though?

13 A Right. As far as I know, he was still weld-  
14 ing.

15 Q Did he have any decrease in salary because --

16 A No, he -- no, he didn't.

17 Q Then he reached age 62 and could retire?

18 A And he retired, uh-huh.

19 Q I see his birthday was in February and he  
20 retired in February?

21 A Right. His birthday was the 5th and he re-  
22 tired on the 15th.

23 Q What was the amount of his Social Security  
24 benefits?

25 A Pardon me, Honey?

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1 Q The amount of his Social Security benefits?

2 A He was drawing \$700 -- wait, now, it has gone  
3 up twice since. They had a raise, and  
4 it is -- I believe it is \$735. I am not  
5 sure, but I'm sure it was in the \$700-  
6 mark.

7 Q He did have a retirement program from  
8 Avondale?

9 A Uh-huh.

10 Q What was that?

11 A That was \$374 a month.

12 Q Let me ask you, Mrs. Ramirez, while we are on  
13 the subject of income, what is the  
14 source of your income, please?

15 A You mean mine? Mine is -- I get \$740 and I  
16 get half of the pension, \$135.40.

17 Q Is that Social Security, the \$740?

18 A \$740 is Social Security.

19 Q And half of the \$374?

20 A \$135 is all they give me now. That is for  
21 ten years.

22 Q From the time he got out of Charity in 1974  
23 until he retired, was he under medical  
24 care?

25 A From when, Honey?

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1 Q From the time he got out of Charity in 1974  
2 to when he retired, --

3 A He was going back to Charity.

4 Q Back there again?

5 A Every six months.

6 Q For the chest X-rays?

7 A Uh-huh.

8 Q Here again, during that period of time, did  
9 you ever have the chance to talk with  
10 the doctors?

11 A No, uh-uh, but he changed from Charity -- he  
12 could not go to Charity anymore. He  
13 could not make it across the river any-  
14 more, so I heard of these pulmonary  
15 doctors at West Jefferson Hospital in  
16 Marrero, and I called my family doctor,  
17 Dr. Moseby, and asked him wouldn't it be  
18 a good idea to send him to these doctors  
19 at West Jefferson, and he said it would  
20 be a wonderful idea. He said "Start  
21 bringing him there." I started taking  
22 him there in 1982, I think it was -- I  
23 think it was 1982.

24 Q From 1974 to 1979 he kept going out to  
25 Charity?

1 A Right.

2 Q Those doctors over at West Jefferson, who  
3 were they?

4 A Dr. Rosenberg and Grimstad and Richardson.

5 Q Did he see them with any regularity?

6 A Every three months, about every three months.

7 Then he was in the hospital -- I think  
8 he was in the hospital three times be-  
9 fore he died with -- well, they had to  
10 give him steroids. He couldn't breathe  
11 at all. In February -- on February 2nd,  
12 1983, that is when he started taking  
13 oxygen, until he died on September 24th,  
14 1984.

15 Q Was that oxygen as needed?

16 A At first he took it as he needed it, but then  
17 for about six months before he died, he  
18 came -- he couldn't come out from under  
19 it at all. I had to give him his bath  
20 and all under oxygen. He had one of  
21 these long cords that took him -- that  
22 we would take him to the bathroom and  
23 the kitchen and everywhere. Then he got  
24 so that he couldn't get out of bed any-  
25 more. He also had to get a portable

1 oxygen to take him to the doctor. He  
2 could not do without it at all.

3 Q After he retired, up until this stage that  
4 you just told us about, when he was on  
5 the oxygen all the time, was he able to  
6 do anything like cut the grass or any-  
7 thing like that?

8 A No.

9 Q Fix things around the house?

10 A Nothing. He would just sit around. He was  
11 too short-winded. He couldn't do any-  
12 thing.

13 Q Other than the lung problems that you told us  
14 about through the years that you were  
15 married, were there any other health  
16 conditions that you know of that your  
17 husband had?

18 A None that I know of. My husband was healthy  
19 otherwise. The doctor, after he died,  
20 when I went to see him about paying the  
21 bill and everything, I asked him how  
22 was his heart and he said he had a  
23 wonderful, fine heart. He said there  
24 was no problem with the heart. Oh, I  
25 remember now, he had cataract surgery.

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1 I forgot about that, I'm sorry.

2 Q When was that?

3 A Oh, my, I -- I can't remember.

4 MR. COVERT:

5 My extract of the hospital records

6 shows September 16th, 1981, Harriet.

7 MS. COHEN:

8 Just a few more questions.

9 EXAMINATION BY MS. COHEN:

10 Q I think he had surgery, didn't he, or some--

11 A Well, I really can't think today. He had an  
12 abscess in his rectum, yes.

13 Q When was that?

14 A That was 1981.

15 Q March of 1981?

16 A Right; that's all I can remember.

17 Q Did you ever talk with any of the pulmonary  
18 specialists on the Westbank about your  
19 husband's condition?

20 A Yes, but they would talk to me right in front  
21 of him, you know. When he was -- they  
22 just told me, you know -- well, I broke  
23 my leg three weeks before he died, and I  
24 could barely get to the hospital. They  
25 told my daughters about how long he had

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1 to live and everything. That is about  
2 the only thing. One of the doctors,  
3 Dr. Richardson, -- my daughter said  
4 this, she said "He has a lot of asbes-  
5 tos, huh?" she said "Yes, he has that  
6 too," but she told us something else,  
7 she said -- she said "A lot of this is  
8 caused from cigarettes and things like  
9 that too," you know, but he did have  
10 asbestos, she said.

11 Q What doctor said that?

12 A Dr. Richardson told her that.

13 MR. GROSSEL-ROSSI:

14 Which Dr. Richardson?

15 THE WITNESS:

16 A lady doctor. I don't know the  
17 first name.

18 MR. COVERT:

19 You don't remember her first name?

20 THE WITNESS:

21 I don't.

22 EXAMINATION BY MS. COHEN:

23 Q She is in with Grimstad and them?

24 A Yes. She went ~~in~~ about two months before my  
25 husband died.

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1 Q Anything else?

2 A I remember now too he did have a little  
3 prostate trouble. He was in West  
4 Jefferson.

5 Q One of your daughters talked to Dr.  
6 Richardson, you say?

7 A Uh-huh.

8 Q She said that there were several things, is  
9 what you said?

10 A She said he had a lot of problems. My  
11 daughter said "Asbestos is one, isn't  
12 it?" and she said "Yes, but that is not  
13 his main problem." That is all she  
14 said.

15 Q After his death, did you ever talk with the  
16 doctors about his condition?

17 A No, I didn't. I could not get around to even  
18 go see him. I had broke my left leg  
19 then. I was not driving or anything  
20 and I couldn't get around much.

21 Q You say your daughter talked with Dr.  
22 Richardson about asbestos. Did your  
23 husband ever discuss asbestos with you?

24 A No.

25 Q Was he ever in the military service?

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1 A No.

2 Q Are there any other doctors that he saw  
3 besides those at Charity and Dr. Moseby  
4 and Dr. Gidman for awhile, and then the  
5 pulmonologist on the Westbank?

6 A Well, Dr. Moseby and Dr. Firestone worked  
7 together. One time he would go there  
8 and he would see Firestone and the next  
9 time he would see Moseby. That is the  
10 way they worked it there. That is the  
11 Expressway Medical Clinic in Harvey.

12 Q Did your husband smoke when you all married?

13 A Uh-huh.

14 Q Did he ever say how old he was when he  
15 started?

16 A No, he never told me. He was 20 years old  
17 when he got married.

18 Q How much was he smoking then, if you know,  
19 when you married him?

20 A He was smoking Luckies, but ---

21 Q Luckies?

22 A Yes.

23 Q About how many a day?

24 A Well, I really can't say. I really don't  
25 remember. I never paid any attention,

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1 really.

2 Q Did he smoke up until he went on oxygen, or  
3 when did he stop?

4 A No, he stopped smoking in 1979. The doctors  
5 at Charity told him to quit smoking,  
6 when he had that abscess on his lung,  
7 pneumonia and all, they told him to  
8 quit then, so he quit.

9 Q Do you know the extent of his smoking then?

10 A I don't think he was even smoking a pack a  
11 day, really.

12 Q Do you know in that in-between period, the  
13 time you all married until he stopped,  
14 what he was averaging a day?

15 A I think maybe a pack or less.

16 Q Do you know if 1979 was the first time a  
17 doctor ever told him to stop smoking?

18 A Yes.

19 Q What about anybody else, did you or the  
20 girls, your daughters, or anybody else  
21 ever suggest to him that he should stop  
22 smoking?

23 A I suggested it to him 18 years ago, when I  
24 quit. I asked him then to quit, and he  
25 said no, he couldn't, he was too nervous.

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1 Q What made you quit?

2 A Fright, when all of this came about, lung  
3 cancer and stuff, I said "I have enough  
4 problems without worrying about that."

5 Q Did you talk with him about the reason you  
6 stopped, your fear of cancer and all?

7 A Yeah, I did, that's right. I even told him  
8 "Don't you think you are swallowing  
9 enough smoke at Avondale without  
10 swallowing more when you come home?"  
11 He said "I can't stop now, I'm too  
12 nervous."

13 Q Had you all seen anything on television or  
14 read anything that in particular you  
15 can think of that prompted you to stop?

16 A Right, that is when they discovered that it  
17 caused lung cancer.

18 Q That is when they started putting these  
19 little notices on the sides of the  
20 cigarette packages?

21 A That is when I did, right.

22 Q To your knowledge, your husband was aware  
23 that the little notice was on the side?

24 A He was, yes.

25 Q Was he on medication during the last several

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1                   years of his life?

2     A       Yes, he was taking breathing pills.

3     Q       The pulmonary doctors were giving him that?

4     A       Uh-huh.

5     Q       Do you know of any accidents that he may have  
6                   had or some things that might have  
7                   happened at work, anything like an auto-  
8                   mobile accident, any trauma to his body,  
9                   other than naturally things like flu and  
10                  such?

11    A       He did have an accident, but he was -- he was  
12                  at Avondale. He was welding a hot bolt  
13                  and it exploded in his eyes. I am not  
14                  sure if he was at Avondale then or Delta  
15                  Shipyard. I know it was many years ago.

16    Q       Do you know of any broken ribs or do you know  
17                  of anything like that he might have had?

18    A       No, uh-uh.

19    Q       After that chest X-ray at Ochsner --

20    A       Not Ochsner.

21    Q       At Avondale, sorry, that led to his going to  
22                  the hospital, do you know if Avondale  
23                  had any X-rays run on the men after  
24                  that?

25    A       No.

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1 Q You don't know or they didn't?

2 A They didn't. I don't think so, because he  
3 had never taken any more there, that I  
4 know of.

5 Q I believe both of your daughters live on the  
6 Westbank.

7 A No, ma'am, one lives on the Westbank and the  
8 other lives in Metairie.

9 Q Has the one in Metairie always lived, since  
10 she has been married, there?

11 A She lived with me and her father until a year  
12 ago this month, when she got married.

13 Q And that was --

14 A She lived with us.

15 Q When did you say she married?

16 A June 1st, 1985.

17 Q So she was with you all when --

18 A Uh-huh, yeah.

19 Q Okay.

20 A She works on the Westbank, though.

21 Q Glenda, now --

22 A Glenda is not married.

23 Q Now, did she live far from you?

24 A No.

25 Q Was she living at the same address when your

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1 husband was living, where she lives now?

2 A [DELETED]

3 Q And Myrna's last name is what?

4 A Grice.

5 Q I assume that she is the daughter that  
6 talked to the doctors?

7 A Right.

8 Q The one who gave you the newspaper clipping?

9 A Right. Maybe they both spoke to him, I don't  
10 know, because -- Mrs. Grice is the one  
11 that stayed with him in the hospital.  
12 I think he stayed there the last time,  
13 when I had my leg broke, for about nine  
14 days, and she would stay with him from  
15 5:00 in the afternoon until 9:00 in the  
16 morning. I don't know if she ever spoke  
17 to the doctor or what, but she is the  
18 one that went and admitted him in.

19 Q Had you all ever been separated any time  
20 during your married life?

21 A No, never.

22 Q You gave us the name of two fellow co-workers  
23 that your husband was friendly with.  
24 Do you ever see any of these people?

25 A Yeah, I see Mr. Piccola, because he comes

1 over -- he and his wife are still good  
2 friends of mine. They visit me some-  
3 times.

4 Q What about the other gentleman?

5 A Oh, I see him in Schwegmann's Grocery a lot.  
6 We tease him, tell him he is part-owner  
7 of the grocery. He lives right around  
8 there.

9 Q Do you know if your husband had one super-  
10 visor toward the latter years of his  
11 work, any one man that was over him for  
12 any length of time?

13 A I'm not sure, but I think Mr. Piccola was his  
14 boss for awhile. I know he had others  
15 too, but I can't -- I can't tell you  
16 that. You would have to ask someone  
17 else at Avondale for that, because I  
18 can't say. I don't know -- yeah, he had  
19 a Mr. Dodd, D-o-d-d.

20 Q Dodd?

21 A Yes, but Mr. Dodd died of lung cancer. That  
22 was about six months after he died.

23 Q Mrs. Ramirez, the suit that has been filed  
24 on your behalf names certain manu-  
25 facturers of asbestos products. I will

1 name the companies to you: Fibreboard  
2 Corporation, Owens-Illinois, Owens-  
3 Corning Fiberglas, Eagle-Picher  
4 Industries, Pittsburgh Corning  
5 Corporation, Celotex Corporation, Keene  
6 Corporation, Rockwool Manufacturing  
7 Company. I certainly don't intend to go  
8 into any attorney-client privilege, but  
9 can you just tell me this, if you gave  
10 those names to your attorney and asked  
11 that he file suit against those com-  
12 panies?

13 MR. COVERT:

14 It was vice-versa, Harriet. I ad-  
15 vised her who to sue.

16 MS. COHEN:

17 Okay.

18 MR. COVERT:

19 Isn't that correct?

20 THE WITNESS:

21 Yes.

22 EXAMINATION BY MS. COHEN:

23 Q Is this the only suit pending, the only suit  
24 that you filed, as a result of your  
25 husband's illness and death?

1 A Yes.

2 Q The pension check that you get, does that  
3 come right from Avondale or from some  
4 insurance carrier?

5 A From some insurance. Now, they just changed  
6 the name. It comes from New York, I  
7 believe it is.

8 Q Do you know of any suits that your husband  
9 filed at any time in his life for any  
10 reason?

11 A No, none.

12 Q What about any claims made against any of the  
13 companies?

14 A No, uh-uh.

15 Q Was there an autopsy performed?

16 A No. He died at home, you see -- I'm sorry I  
17 didn't have one done.

18 MS. COHEN:

19 No other questions.

20 EXAMINATION BY MS. RICHTER:

21 Q I am Lael Richter and I represent one of the  
22 manufacturers that you and your attorney  
23 have filed suit against. Did your hus-  
24 band ever mention any products by name  
25 at home? In other words, I am asking



1                   you did he ever mention any companies  
2                   that manufactured products?

3    A     No, he never did.

4    Q     Did you ever hear him mention a company  
5           called GAF Corporation?

6    A     No.

7    Q     Did you ever hear him mention a company  
8           named Ruberoid?

9    A     No.

10           MS. RICHTER:

11                   No other questions.

12           EXAMINATION BY MR. GROSSEL-ROSSI:

13   Q     One of the last questions that counsel asked  
14           you, the status of an autopsy -- let me  
15           apologize for having to ask you this  
16           sort of thing, because I know it is  
17           painful and difficult for you, but I  
18           have got to do it. Why did you say you  
19           were sorry you didn't have an autopsy  
20           performed?

21   A     Because I wanted to see more about what  
22           really caused his emphysema.

23   Q     Caused the emphysema?

24   A     Right.

25   Q     But that was not his cause of death, was it,

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1 to your knowledge?

2 A Well, yes. He smothered to death, really.

3 Q You mentioned that one of the doctors, one  
4 of the treating physicians on the  
5 Westbank, had told one of your daughters,  
6 and I have forgotten which daughter,  
7 that asbestosis was not his main prob-  
8 lem.

9 A That is what she said.

10 Q To your understanding, did you discuss that  
11 with your daughter since that time, in  
12 other words, if that wasn't his main  
13 problem what was the main problem?

14 A I don't know; I couldn't answer that.

15 Q Your daughter has not related that to you?

16 A That was Glenda. She is downstairs.

17 Q I'm sorry?

18 A She is downstairs right now.

19 Q Do you know at least which doctor?

20 A Dr. Richardson.

21 Q The lady doctor?

22 A Right.

23 MR. GROSSEL-ROSSI:

24 No other questions. Thank you very  
25 much.

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1 MR. COVERT:

2 No questions.

3 EXAMINATION BY MS. COHEN:

4 Q It is[DELETED] where you all are living?

5 A Right.

6 Q Is that near, anywhere near, Johns-Manville's  
7 plant?

8 A Johns-Manville is in Marrero.

9 MS. COHEN:

10 No other questions.

11 (DISCUSSION OFF THE RECORD)

12 EXAMINATION BY MS. COHEN:

13 Q Has your attorney advised you that he is  
14 going to bring in another company,  
15 National Gypsum? Here again, without  
16 trying to get into the privilege that  
17 you and your attorney have, did you --  
18 well, I don't know, maybe I am on the  
19 borderline.

20 MR. COVERT:

21 Let me explain to you, she said  
22 they lived next door to an asbestos  
23 plant, and they didn't know who it was,  
24 it's out of business, something like  
25 that.

1 THE WITNESS:

2 They went out of business after my  
3 husband left there, years after, though.

4 MR. COVERT:

5 We had no idea who that was until  
6 I read this thing that she gave me today  
7 and found out it was National Gypsum.

8 MR. GROSSEL-ROSSI:

9 The City Directory would give that  
10 to you.

11 MS. COHEN:

12 It was not National Gypsum at the  
13 time they were living there, though.

14 (WITNESS EXCUSED)  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

C E R T I F I C A T E

I, PAUL W. WILLIAMS, Certified Shorthand  
Reporter in and for the State of Louisiana, do  
hereby certify the above and foregoing is true and  
correct as taken by me on June 12th, 1986.

*Paul W Williams*  
PAUL W. WILLIAMS

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